

Title 8 Reform Project

Advisory Committee Meeting

September 26, 2001

Project Goal

Primary Goal:

To create a user friendly Title 8.

Secondary Goal:

Develop organizing rules.

- 1. To be used in the reform process,*
- 2. To be used as a roadmap to the Safety Orders,*
- 3. To be used during future rulemaking.*

Current Title 8 Safety Orders

- We don't want to remove any regulatory requirements nor lessen the their impact.
- We may want to add appropriate requirements where needed but is outside the scope of this project.

Project Limits

- **To only make non-substantive changes.**

The Project Scope excludes changes to:

- 1. The protective level of Title 8.**
- 2. The enforceability of safety orders.**
- 3. The number of affected individuals.**

Proposed Reform Processes.

The Title 8 Reform to be accomplished using a series of smaller rulemaking actions using either:

- 1. The regular rulemaking process or**
- 2. The Section 100 (No regulatory effect.)**

Usability Problems of Title 8

1. Horizontal and vertical standards found throughout all subchapters.
2. Subchapters are not arranged in a logical order.
3. Hierarchy of organizational headings not used consistently.
4. Duplicative safety orders.
5. Some requirements are difficult to find.

Proposed Reform as of 6/28/01

1. Develop the blueprint for a user-friendly Title 8.
2. Move horizontal and vertical standards in appropriate subchapters.
3. Organize subchapters in a logical order.
4. Organize and identify the safety orders in each subchapter using a logical and consistent hierarchy.
5. Identify or eliminate hidden requirements.
6. Eliminate duplicative safety orders.
7. Renumber the Safety orders after each phase.
8. Create a comprehensive index.
9. Divide the Title 8 Reform Project into smaller reform projects and submit each of these smaller projects to the Office of Administrative Law separately.

The Blueprint

1. To be presented to the Standards Board for approval on or before July 2002.
2. The framework of the reformed Title 8 Chapter 4 including:
 - Structural layout of Proposed Title 8, Chapter 4
 - Rules used in the restructuring process,
 - Type of reform process to be used for each phase.
 - Order or sequence in which the phases will be submitted to the Office of Administrative Law
 - A format for the index.

Developing the Blueprint for:

1. Organizing the subchapters in a logical order.
2. Moving horizontal and vertical standards in appropriate subchapters.
3. Moving safety orders in appropriate or new subchapters.
4. Organizing and identifying the safety orders in each subchapter using a logical and consistent hierarchy.
5. Identifying or eliminating hidden requirements.
6. Eliminating duplicative safety orders.
7. Renumbering the Safety orders.
8. Creating the index.

Logical Hierarchy: Title 8, CCR

Division: Industrial Relations

Chapter 4

Subchapter:

Group

Article

Section

Subsection

Organizing subchapters.

Options:

1. Don't change subchapter structure
2. By Horizontal and Vertical Standards
3. By Industry
4. By Industry and Workplace.
5. Combination of the above.

Organizing subchapters.

- **Chapter 4: Industrial Relations**
- **Subchapter: Horizontal / Vertical**

Subchapter 1: General Industry:
All Horizontal Standards

Subchapter 2: Industry Specific:
All Vertical Standards

Organizing subchapters: Horizontal / Vertical

Subchapter 1: General Industry:

Group 1: Admin

Group 3: PP Equipment

Group 5: Haz-Comm

Group 7: Occup. Safety

Group 9:

Group 11:

Group 13:

Group 15:

Group 17:

Group 19:

Group 21:

Group 23:

Group 2: Training

Group 4: Emergency Med.

Group 6: Occup. Health

Group 8: Etc.

Group 10:

Group 12:

Group 14:

Group 16:

Group 18:

Group 20:

Group 22:

Group 24:

Organizing subchapters: Horizontal / Vertical

Subchapter 2: Industry Specific

Group 1: Construction

Group 3: Petroleum

Group 5: Mine

Group 7: Telecomm.

Group 9: Etc.

Group 11:

Group 13:

Group 15:

Group 17:

Group 19:

Group 21:

Group 23:

Group 2: Electrical

Group 4: Tunnel

Group 6: Diving Operations

Group 8: Compressed Air

Group 10:

Group 12:

Group 14:

Group 16:

Group 18:

Group 20:

Group 22:

Group 24:

Organizing subchapters.

- **Chapter 4: Industrial Relations**
- **Subchapter: Industry Specific**
 - 1 General (GISO)**
 - 2 Construction (including Electrical, Tunnel)**
 - 3 Mine**
 - 4 Agriculture**
 - 5 Logging/Sawmill**
 - 6 Ship**
 - 7 Petroleum**
 - 8 Telecomm.**

Organizing subchapters.

- **Chapter 4: Industrial Relations**
- **Subchapter: Industry & Work Site Specific**
 - 1 General (GISO)
 - 2 Construction
 - 3 Electrical
 - 4 Mine
 - 5 Agriculture
 - 6 Logging/Sawmill
 - 7 Compr. Air Work & Diving
 - 8 Ship
 - 9 Tunnel
 - 9 Elevators/Rides/Tramways
 - 10 Petroleum
 - 11 Explosives
 - 12 Telecomm
 - 13

Moving safety orders in appropriate subchapters.

For example:

1. Current Scaffold regulations found in both the CSO and GISO
2. Diving operations found in GISO and Compressed Air Work sites in own Subchapter.
3. Fall Protection regulations found in GISO, CSO, TSO and ESO

**Identifying or eliminating
hidden requirements.**

**Eliminate duplicative safety
orders.**

**Renumbering the Safety orders.
Creating the index.**

Developing the Blueprint for:

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7. Renumbering the Safety orders.
8. Creating the index.